

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-11490 JLT

TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA (FORMERLY
KNOWN AS THE TRAVELERS
INDEMNITY COMPANY OF ILLINOIS)
INDIVIDUALLY AND A/S/O DACON
CORPORATION AND A/S/O
CONDYNE VENTURES, LLC.,
Plaintiff

vs.

GENESIS INDEMNITY INSURANCE COMPANY
And TIG INSURANCE COMPANY,
Defendants

**JOINT EMERGENCY MOTION TO EXTEND OPPOSITION
TIME TO RESPOND TO PENDING MOTIONS**

All parties in the above-referenced matter and hereby jointly request this Honorable Court to extend the deadline for filing oppositions to all pending motions. The current deadline for filing opposition is November 15, 2005 and the parties are requesting an additional 2-week extension (until November 29, 2005).

There will be no prejudice as the hearing on the motions is set for January 19, 2006, and a delay in receipt of the opposition will not affect any party.

Respectfully Submitted,

The Plaintiffs,
By their attorney,

/s/William P. Mekrut
William P. Mekrut, BBO#654350
MURPHY & RILEY, P.C.
141 Tremont Street
Boston, MA 02111
(617) 423-3700

The Defendants,
Genesis Indemnity Insurance Company
By their attorney,

/s/ Jocelyn M. Sedney
Jocelyn M. Sedney, BBO# 552115
BRODY, HARDOON, PERKINS & KESTEN, LLP
One Exeter Plaza, 12th Floor
Boston, MA 02116
(617) 880-7100

The Defendant,
TIG Insurance Company
By their attorney,

/s/ William B. Scarpelli
William B. Scarpelli, BBO#560034
Morrison Mahoney LLP
250 Summer Street
Boston, MA 02210
(617) 737-8886

Dated: November 14, 2005